## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH CAROLINA CASE NO. 5:20-CV -230

X
CAMERON CAIN BAARBÉ, et al.,
Plaintiffs, -against-
THE SYRIAN ARAB REPUBLIC,
Defendant.
X

## **EXPERT DECLARATION OF DR. RAEL STROUS**

**RAEL STROUS, M.D.**, pursuant to 28 U.S.C. § 1746, subject to the penalties for perjury of the United States of America, declares as follows

- 1. I am a physician licensed to practice medicine in the State of Israel.
- 2. I have been retained by Plaintiffs in above-captioned matter to provide expert opinions regarding the psychological injuries suffered by Plaintiffs Cameron Cain Baarbé, Beatriz Gonzalez, Jose Hernandez, Reynaldo Gonzalez, Paul Gonzalez, Caryn Orbach, Uri Orbach, Eitan Orbach, Alon Orbach, A.O., E.O., O.O., Eytan Rund, Tamar Rund, S.A.R., H.H.R., Y.M.R., Ron Greenfield, Pnina Greefield, Liron Greenfield, Shere Greenfield, Gili Greenfield, Shye Greenfield, Nitzhia Goldman, Gila Nissenbaum, Nathan Goldman, Tamar Choresh, Maya Goldman Cohen, Sharon Goldman, Joseph Goldman and Israel Gorenzsky.
- 3. I have no personal or professional relationship with any party in this case that would prevent me from providing impartial testimony in this matter. I am being compensated \$2,000 per Plaintiff for my evaluation and for preparing my report and this declaration except the minor Plaintiffs' fee is \$1,500-\$1,700 per minor.

- 4. My full *curriculum vitae* ("CV") is attached hereto as Exhibit A. It contains an accurate recitation of my training, experience, and credentials.
- 5. I have prepared reports regarding my evaluation of each of the plaintiffs, each of which is true to the best of my own knowledge and belief. Those reports are attached hereto as follows:

Exhibit B - Plaintiff Cameron Cain Baarbé

Exhibit C - Plaintiff Beatriz Gonzalez

Exhibit D - Plaintiff Jose Hernandez

Exhibit E - Plaintiff Reynaldo Gonzalez

Exhibit F - Plaintiff Paul Gonzalez

Exhibit G - Plaintiff Caryn Orbach

Exhibit H - Plaintiff Uri Orbach

Exhibit I - Plaintiff Eitan Orbach

Exhibit J - Plaintiff Alon Orbach

Exhibit K - Plaintiff A.O.

Exhibit L - Plaintiff E.O.

Exhibit M - Plaintiff O.O.

Exhibit N - Plaintiff Eytan Rund

Exhibit O - Plaintiff Tamar Rund

Exhibit P - Plaintiffs S.A.R., H.H.R., Y.M.R.

Exhibit Q - Plaintiff Ron Greenfield

Exhibit R - Plaintiff Pnina Greenfield

Exhibit S - Plaintiff Lion Greenfield

Exhibit T - Plaintiff Shere Greenfield

Exhibit U - Plaintiff Gili Greenfield

Exhibit V - Plaintiff Shye Greenfield

Exhibit W - Plaintiff Nitzhia Goldman

Exhibit X - Plaintiff Maya Goldman

Exhibit Y - Plaintiff Sharon Goldman

Exhibit Z - Plaintiff Joseph Goldman

Exhibit AA - Plaintiff Gila Nissenbaum

Exhibit BB - Plaintiff Nathan Goldman

Exhibit CC - Plaintiff Israel Gorenzksy

Exhibit DD - Plaintiff Tamar Choresh

6. I declare under the penalties for perjury of the United States of America that the foregoing statements, and the statements contained in my CV and my reports are true and correct.

Dated: March <u>15</u>, 2023

Rael Strous, MD

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed this the 29th day of March 2023 with the Clerk of Court using the CM/ECF system. Parties may access this filing through the Court's Electronic Filing System.

## SHANAHAN LAW GROUP, PLLC

By:

/s/ Kieran J. Shanahan

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Attorney for Plaintiffs

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Attorney for Plaintiffs